

ACCEPTED/FILED

**From:** Len.Hagaman <Len.Hagaman@watgov.org>  
**Sent:** Monday, December 09, 2013 2:29 PM  
**To:** Tom Wheeler  
**Cc:** Al Reed; Margaret Pierce; Deron.Geouque

MAR 25 2014

Federal Communications Commission  
Office of the Secretary

In regard to the FCC Report and Order and Further Notice of Proposed Rulemaking on Rates for Interstate Inmate Calling Services (WC Docket No. 12-375), I am requesting that the ICS Order, referenced above and scheduled to go into effect February 11, 2014, be **STAYED** as it applies to Sheriffs and jails;

The FCC Order mandates a "one-size-fits-all" approach to regulating inmate calling services for both prisons and jails. Please understand that the Order fails to take into account the unique challenges inherent in providing calling services to the majority of our detention center, as we are small in size (106 beds) and have high turnover of inmate populations weekly. Inmate calling systems are built to the unique needs of our detention center and provide a variety of important safety and security components.

This Order disregards this reality and creates a regulatory environment that jeopardizes these services. We may be forced to severely limit or eliminate inmate calling privileges – such a move not only affects our current budget, but poses a real threat to safety, security, and legal access for out inmates.

The FCC has recognized in its Order that jails incur real costs to administer inmate calling services; however, the rates set by the FCC eliminate commissions to jails on inter-state calls and do not include any allowance for cost recovery for jails. A STAY must be granted for jails until such time as the FCC and Sheriffs can determine a proper method for jails to recover these costs. Because Sheriff's Office budgets are already set for 2014, many Sheriffs will not have the financial resources necessary to continue to administer inmate calling services and perform the vital security functions required to protect the public.

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